

Minnesota Pollution Control Agency

November 29, 1993



Mr. William Taylor
General Mills, Inc.
9000 Plymouth Avenue North
Minneapolis, Minnesota 55427

Dear Mr. Taylor:

I am responding to your letter dated October 14, 1993, which I received on October 21, 1993. My response is being made in as timely a fashion as possible, given the pressures associated with working on a number of other large and complicated sites.

I will respond to each of the issues that you raised in your correspondence:

1. **Delisting the Site:** As you indicated, you received the letter dated September 14, 1993, from Tom Alcamo in which he indicated that "delisting the General Mills /Henkel site from the NPL is not possible at this time." Mr. Alcamo provided documentation from the U.S. Environmental Protection Agency (EPA) in support of that position. Basically, before the site can be delisted, General Mills, Inc. (General Mills) must demonstrate that the cleanup levels required in the Consent Order have been achieved and the EPA must agree that those cleanup levels are acceptable.
2. **Reduce Monitoring and Reporting Requirements:** Minnesota Pollution Control Agency (MPCA) staff has reviewed the 1994-1999 Operations and Monitoring Plan which you enclosed as an attachment. The following are our comments:

General Comments

Note that more information is required to evaluate the proposal to discontinue monitoring in the wells specified. Historical monitoring data shall be provided so that the proposal may be evaluated in the context of ground water quality trends for each of the wells. As a condition to discontinue monitoring, the locations of these wells must be demonstrated to lie within the capture zone for the respective aquifer. As part of this analysis, minimum discharge rates to achieve adequate capture must be presented. Additionally, assurances of maintaining the minimum ground water extraction rates for capture must be provided. If the wells cannot be demonstrated to lie within the capture zone, more information indicating why additional sampling is not necessary needs to be provided.

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Mr. William Taylor
Page 2
November 29, 1993

The proposal shall provide figures showing the locations of all wells discussed.

Specific Comments

Paragraph 6

More information needs to be given about the Target Pumping Rates and Action Levels that are given in Table 2. Does the attainment of the Action Level ensure adequate groundwater capture? How will the Target Pumping Rate be used? If a well discharge falls below the Action Level, will the system be modified to attain the Target Level?

Paragraph 7

What action will be taken if drawdowns similar to the 1992 pumping test are not observed?

Paragraph 11

Discussions regarding ground water quality trends for the St. Peter monitoring wells and the Henkel well must be accompanied by historical ground water monitoring data for those wells. Additionally, the request shall provide justification as to why monitoring of these wells ensuring that no further impact to ground water will occur, is unnecessary.

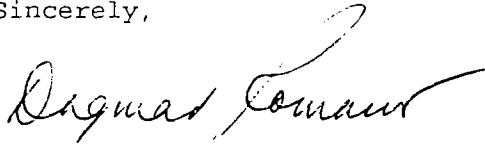
3. Reduce Operating and Maintenance Cost: Both John Seaberg and I have indicated to you that General Mills should not remove the packing material from the stripping tower without receiving approval from the MPCA. We further explained that, since removing the packing material would not affect the ground water pump out system while it would have implications for water quality issues, approval to remove the packing material would need to be provided through the MPCA Water Quality Division. In discussions with Caroline Voelkers, MPCA Water Quality Division, it is apparent that the National Pollutant Discharge Elimination System permit limits need to continue to be met were the packing material to be removed. If the permit limits were not met, General Mills would be in violation of the permit and subject to MPCA enforcement action. In a recent telephone discussion with Peter Sabee, I suggested that he discuss this issue with Ms. Voelkers.
4. Consistency of MPCA Actions: I am unclear about which issues you consider to have been treated inconsistently as a result of MPCA staff turnover. Even though staff may change, MPCA and EPA policies generally do not and staff, in adhering to those policies, should be

Mr. William Taylor
Page 2
November 29, 1993

following a fairly consistent approach at the site. If you feel that this is not the case, please provide additional information for our review.

Thank you for sharing your concerns and questions with us. We look forward to continuing to work with you in the cooperative manner which you have helped to foster.

Sincerely,

A handwritten signature in cursive script, reading "Dagmar Romano". The signature is written in dark ink and is positioned below the word "Sincerely,".

Dagmar M. Romano
Project Manager
Response Unit I
Site Response Section
Ground Water and Solid Waste Division

DMR:pk

cc: Tom Alcamo, U.S. Environmental Protection Agency